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March 27, 2024

**VIA ECF FILING**

United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201  
Courtroom 4B  
Honorable Diana Gujarati

**Re:** Bullion Exchange LLC v. Bullion Shark, *et. al.*  
**Case No.:** 24-cv-00467-DG-JMW

Dear Judge Gujarati,

This Firm represents Defendant Ekaterina Ovodova (“Ovodova”), in the above-entitled matter. Defendants Bullion Shark join in the following request for an adjournment pursuant to Your Honor’s March 20, 2024, Order directing a response to the Plaintiff’s application by March 29, 2024. *See* ECF Entry dated March 20, 2024.

Pursuant to Your Honor’s Individual Practice Rules Section I. (F), Defendants are requesting an *additional* one (1) week adjournment to provide a response to Plaintiff’s Motion for Preliminary Injunction and Temporary Restraining Order. *See* ECF Docket Nos.: 7-11.

I am requesting the additional time to provide a response because I had a death in my wife’s family on Sunday. On Monday I could not work because of funeral arrangements. I anticipated getting my response done this week, but I have been backed up all week because of the loss of the workday on Monday. This is my second request. Plaintiff’s Counsel does not consent to the request. I emailed and spoke with the Plaintiff’s Counsel earlier today and he informed me that he will be reaching out to his client to determine if they will grant a further adjournment. I have not received any response but based on time constraints and pursuant to Your Honor’s Part rules, I had to put in the instant request.

Assuming the request is granted, and based on the Plaintiff’s Counsel’s prior request, he would like an additional two (2) weeks to provide a response/reply to the Defendants’ anticipated oppositions.

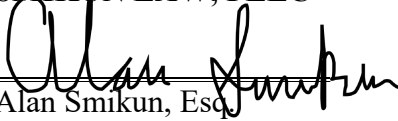
The following is the proposed briefing schedule:

- Defendants' oppositions are due on or before April 5, 2024;
- Plaintiff's reply, *if any*, is due on or before April 19, 2024.

I thank this Court for its continued courtesies.

Respectfully,

SMIKUN LAW, PLLC



Alan Smikun, Esq.

cc: VIA ECF

Stephen Eric Turman, Esq., *Plaintiff's Counsel*

Kyle Francis Oakes Monaghan., Counsel for Bullion Shark, LLC